

ECF

65 WEST 36<sup>TH</sup> STREET, 7<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10018

TELEPHONE: (212) 594-2400

FAX: (212) 594-4589

EDWARD P. FLOOD

E-Mail: eflood@lyons-flood.com

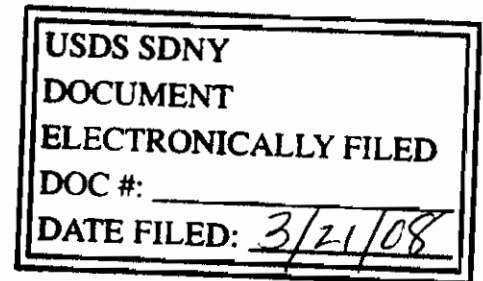
ADMITTED IN NEW YORK

March 20, 2008

**BY TELEFAX**

(212) 805-7930

Honorable James C. Francis  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 1960  
New York, New York 10007-1312



Re: Nelson v. Roehrig Maritime LLC and Tug TILLY LLC  
07 Civ. 6037 (CM) (JCF)  
Our File: 2536021

Dear Judge Francis:

We represent the defendant Roehrig Maritime, LLC in regard to the above maritime personal injury case. Currently the last date for fact discovery is March 31, 2008. We write to request that the parties be granted a one month extension of the deadline for fact discovery, up and until April 30, 2008. Defendant does not seek to extend any of the other litigation deadlines. This is the second request for a time extension in this matter. Plaintiff does not object to this request.

This short additional time is necessary since it appears that the most convenient time to depose a third-party witness – one of plaintiff's treating medical providers – is during the first week of April 2008. Additionally, there are some responses to document demands and requests for admissions which remain outstanding, and may not be produced by March 31, 2008. The parties are confident that this remaining discovery can be completed by April 30, 2008.

## NEW JERSEY OFFICE:

1495 MORRIS AVENUE

UNION, NJ 07083

TEL: (201) 569-4435 FAX: (201) 569-4438

## CONNECTICUT OFFICE:

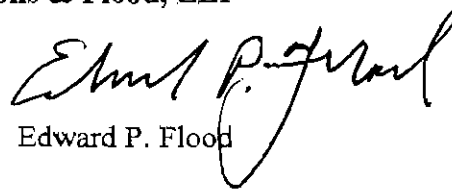
19 COVENTRY LANE

RIVERSIDE, CT 06878

TEL: (203) 661-2355 FAX: (203) 661-2577

Respectfully yours,

Lyons & Flood, LLP



By: Edward P. Flood

VIA E-MAIL

jjames@friedmanjames.com

cc: John P. James, Esq.  
Friedman & James LLP  
132 Nassau Street, Suite 900  
New York, NY 10038

U:\F1\OODDOC\2536021\Correspondence\Francis 01 ltr.doc

3/21/08  
Application granted.  
SO ORDERED.  
James C. Francis IV  
USMJ